

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.)
)
)
SHAUN R. HAYES) No. 4:16-CR-00157-AGF (DDN)
)
)
and)
)
MICHAEL H. LITZ,)
)
)
Defendants.)

GOVERNMENT'S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Gilbert C. Sison, Assistant United States Attorney for said District, and makes the following disclosures pursuant to Federal Rule of Criminal Procedure 12(b)(4):

At trial, the Government intends to use the evidence seized and statements made by the defendants during the events described below. This evidence and these statements are more fully set forth in investigative/incident reports which have been made available to the defendants.

The Government has listed all of the defendants that it believes could possibly argue standing to contest each matter, although the Government is in no way conceding that these individuals, in fact, have standing on these events. Furthermore, the fact that certain defendants are listed as associated with each event would not preclude any other defendant from claiming standing.

EVENT/ITEM	DEFENDANT(S)
Interview of Defendant Shaun R. Hayes on June 13, 2013. • Discovery Disc 1 (Shaun Hayes) • Discovery Disc 4 (Michael Litz)	Shaun R. Hayes
Interview of Defendant Michael H. Litz on December 14, 2015. • Discovery Disc 2 (Michael Litz) • Discovery Disc 4 (Shaun Hayes)	Michael H. Litz
Grand jury testimony of Defendant Michael H. Litz on February 3, 2016. • Discovery Disc 2 (Michael Litz) • Discovery Disc 4 (Shaun Hayes)	Michael H. Litz
Documents abandoned at the offices of Gerald Dunne. • Discovery Disc 6 (Boxes 33 to 39 on Evidence Inventory List) • Documents available for inspection at US Attorney's Office	Shaun R. Hayes, Michael H. Litz

Dated: August 17, 2016.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Gilbert C. Sison
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CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following counsel of record:

Mr. Karl W. Dickhaus – kdickhaus@attystl.com
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s/ Gilbert C. Sison

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